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5 LAW ENFORCEMENT TRAINING AND
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6 JEFFREY A. SCHWARTZ and CYNTHIA
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12 Attorneys for Defendant
REPUBLIC WESTERN INSURANCE
13 COMPANY, sued herein as REPUBLIC
WESTERN INSURANCE
14

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA – SAN JOSE DIVISION
17

18 LAW ENFORCEMENT TRAINING
AND RESEARCH ASSOCIATES,
19 INC., JEFFREY A. SCHWARTZ, and
CYNTHIA BARRY,

20 Plaintiffs,

21 v.

22 REPUBLIC WESTERN
23 INSURANCE, CNA REINSURANCE
COMPANY, and DOE 1-DOE 50,

24 Defendants.
25

CASE NO. C05-04256 JW

STIPULATION TO CONTINUE EXPERT
WITNESS DISCLOSURE DEADLINE AND
PRELIMINARY PRETRIAL AND TRIAL
SETTING CONFERENCE
(N.D. LOCAL RULE 6-2)

THE HON. JAMES WARE

26 WHEREAS the parties' cross-motions for summary judgment have been filed, were
27 argued on June 12, 2006, and have been taken under submission by the Court.

1 WHEREAS by stipulation of the parties and Order of the Court, the deadline for the
 2 parties to disclose expert witnesses and the reports required by Fed.R.Civ.P. 26(a)(2)(B) is
 3 currently set for October 16, 2006 (Docket 63).

4 WHEREAS by stipulation of the parties and Order of the Court, the fact and witness
 5 discovery cut-off is currently set for November 15, 2006 (Docket 63).

6 WHEREAS the Court set December 11, 2006 at 9:00 a.m. as the last day for hearing any
 7 additional dispositive motions in its February 13, 2006 Scheduling Order (Docket 20).

8 WHEREAS the Court set January 22, 2007 as the date for the Preliminary Pretrial and
 9 Trial Setting Conference in its February 13, 2006 Scheduling Order (Docket 20).

10 IT IS HEREBY STIPULATED by and between the parties, through their respective
 11 counsel, that the deadline for the parties to disclose their expert witnesses shall be continued
 12 from October 16, 2006 to **January 15, 2007**. Any party wishing to present expert witness
 13 testimony with respect to a claim or a defense shall lodge with the Court and serve on all other
 14 parties the name, address, qualifications, résumé and a written report which complies with
 15 Fed.R.Civ.P. 26(a)(2)(B) on or before this date.

16 The deadline for disclosing rebuttal expert witnesses shall be continued from October 30,
 17 2006 to **January 29, 2007**. Also, the deadline for objecting to the qualifications or proposed
 18 testimony of an expert shall be continued from December 18, 2006 to **March 19, 2007**.

19 Pursuant to Northern District Local Rule 26-2, the fact and expert witness discovery cut-
 20 off (including all supplemental discovery) shall be continued from November 15, 2006 to
 21 **February 14, 2007**.

22 The last day for the Court to hear any additional dispositive motions shall be continued
 23 from December 11, 2006 to **March 12, 2007** at 9:00 a.m. The parties' mediation efforts are to be
 24 completed no later than **March 30, 2007**.

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1 Finally, the Preliminary Pretrial and Trial Setting Conference shall be continued from
2 January 22, 2007 to **April 23, 2007**. The deadline for the parties to file and lodge with the Court
3 the Preliminary Pretrial and Trial Setting Conference Statement and Proposed Order shall be
4 continued from January 10, 2007 to **April 11, 2007**.

5
6 DATED: September __, 2006 AUNE & ASSOCIATES

7
8 By _____
9 ROBERT E. AUNE
10 Attorneys for Plaintiffs
11 LAW ENFORCEMENT TRAINING AND
12 RESEARCH ASSOCIATES, INC.;
JEFFREY A. SCHWARTZ and CYNTHIA
BARRY

13 DATED: September 2, 2006 SEDGWICK, DETERT, MORAN & ARNOLD LLP

14
15 By _____
16 BRUCE D. CELEBREZZE
17 ROBERT N. BERG
18 Attorneys for Defendant
19 REPUBLIC WESTERN INSURANCE
20 COMPANY, sued herein as REPUBLIC
WESTERN INSURANCE

21 PURSUANT TO STIPULATION, IT IS SO ORDERED.

22
23
24 DATED: _____, 2006
25 JAMES WARE
26 UNITED STATES DISTRICT JUDGE
27

1 Finally, the Preliminary Pretrial and Trial Setting Conference shall be continued from
2 January 22, 2007 to **April 23, 2007**. The deadline for the parties to file and lodge with the Court
3 the Preliminary Pretrial and Trial Setting Conference Statement and Proposed Order shall be
4 continued from January 10, 2007 to **April 11, 2007**.

5
6 DATED: September __, 2006

AUNE & ASSOCIATES

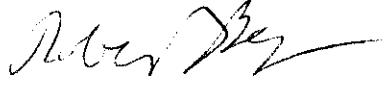
7
8 By _____

ROBERT E. AUNE
Attorneys for Plaintiffs
LAW ENFORCEMENT TRAINING AND
RESEARCH ASSOCIATES, INC.;
JEFFREY A. SCHWARTZ and CYNTHIA
BARRY

9
10
11
12
13 DATED: September 2, 2006

SEDGWICK, DETERT, MORAN & ARNOLD LLP

14
15 By _____


BRUCE D. CELEBREZZE
ROBERT N. BERG
Attorneys for Defendant
REPUBLIC WESTERN INSURANCE
COMPANY, sued herein as REPUBLIC
WESTERN INSURANCE

16
17
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19
20
21 PURSUANT TO STIPULATION, IT IS SO ORDERED.


22
23
24 DATED: _____, 2006

JAMES WARE
UNITED STATES DISTRICT JUDGE

1 Finally, the Preliminary Pretrial and Trial Setting Conference shall be continued from
2 January 22, 2007 to April 23, 2007. The deadline for the parties to file and lodge with the Court
3 the Preliminary Pretrial and Trial Setting Conference Statement and Proposed Order shall be
4 continued from January 10, 2007 to April 11, 2007.

5
6 DATED: September 25, 2006

AUNE & ASSOCIATES

7
8 By 
9 ROBERT E. AUNE
10 Attorneys for Plaintiffs
11 LAW ENFORCEMENT TRAINING AND
12 RESEARCH ASSOCIATES, INC.;
13 JEFFREY A. SCHWARTZ and CYNTHIA
14 BARRY

15
16 DATED: September __, 2006

SEDGWICK, DETERT, MORAN & ARNOLD LLP

17
18 By _____
19 BRUCE D. CELEBREZZE
20 ROBERT N. BERG
21 Attorneys for Defendant
22 REPUBLIC WESTERN INSURANCE
23 COMPANY, sued herein as REPUBLIC
24 WESTERN INSURANCE

25
26 PURSUANT TO STIPULATION, IT IS SO ORDERED.

27
28 DATED: September 26, 2006


JAMES WARE
UNITED STATES DISTRICT JUDGE

Law Enforcement Training v. Republic Western Ins. Co., et al
U.S. District Court, Northern District of California
Case No. C 05-04256 JW
(1411-133281)

PROOF OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Sedgwick, Detert, Moran & Arnold LLP, One Market Plaza, Steuart Tower, 8th Floor, San Francisco, California 94105. On September 25, 2006, I served the within document(s):

1. STIPULATION TO CONTINUE EXPERT WITNESS DISCLOSURE DEADLINE AND PRELIMINARY PRETRIAL AND TRIAL SETTING CONFERENCE (N.D. LOCAL RULE 6-2)
- ☒ ELECTRONICALLY - by causing said document(s) to be delivered through ECF via email by U.S.D.C. Northern District, to the email addresses set forth below on this date before 5:00 p.m.
- ☐ MAIL - by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at San Francisco, California addressed as set forth below.
- ☐ PERSONAL SERVICE - by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.
- ☐ OVERNIGHT COURIER - by placing the document(s) listed above in a sealed envelope with shipping prepaid, and depositing in a collection box for next day delivery to the person(s) at the address(es) set forth below via .

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Attorneys for Defendant CX Reinsurance
Company Limited, sued as CNA Reinsurance
Company

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on September 25, 2006, at San Francisco, California.



Antonia Lee